

Accountability in the Management of Federally Associated Archeological Collections

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Abstract

Federal agency responsibility for managing archeological collections stems from two basic concepts: the intrinsic value of the resources and the need for public accountability. The mandates to manage Federal collections are well defined; however, there is a great variation in accountability and significant diversity in the ways federal collections are managed. This paper explores the background and development of 36 CFR Part 79 (Curation of Federally Owned and Administered Archaeological Collections), and then discusses the status of federal agency/bureau accountability through an examination of curation policies and compliance reporting. Suggestions are provided about how federal collection management might become more uniform and more effective.

Keywords: 36 CFR Part 79, archeological collections, curation, museum collections, public accountability

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Introduction

Many parties are concerned with our nation's archeological collections including field archeologists, funding or permitting agencies, academic researchers, repositories, Native Americans, and the general public. Although all these parties have legitimate interests in the collections, the ultimate legal responsibility for a collection resulting from federally mandated or permitted research falls squarely on the managing federal agency. How well federal agencies manage these archeological collections has become an important issue as legislation and regulation have demanded a greater level of accountability.

The purpose of this paper is to provide a sense of how federal agencies and bureaus are responding to the almost decade-old standards for managing federally associated archeological collections. We first discuss the creation of *Curation of Federally-Owned and Administered Archeological Collections* (36 CFR Part 79) and accountability for archeological collections as federal property. Against these requirements, the accountability of agencies for their collections is examined using data provided by federal agencies (Haas 1996, 1998) and by a sample of repositories housing federally associated collections (NPS 1994). After drawing conclusions about the existing conditions, we suggest approaches to facilitate greater uniformity and accountability in the management of federal collections.¹

Federal Accountability for Collections

Federal agency responsibility for managing all collections rests on two principles. The first, overarching, one is that the objects were removed from real property to which the federal

government holds title or for which it has other legal responsibility, and thus, unless some action of Congress dictates otherwise, its agencies and managers are accountable for these objects. The requirements for acquiring, managing, and disposing of real and personal property preceded the passage of most cultural resources legislation by many years. Modern property management is governed by The Federal Property and Administrative Services Act of 1949, although responsibility for personal property was identified as early as the Civil War. Management of federal property collections is subject to the General Accounting Office's (GAO) *Standards for Internal Controls in the Federal Government* (1983).

The second aspect of federal responsibility for managing collections is accountability for the maintenance of materials because of their intrinsic value. This responsibility is based in federal law and implementing regulations, which in turn are based on standards of conduct for scientific investigations. These standards are consistent with the requirements and philosophy of each academic discipline (the reality of this idea has been the subject of much discussion by non-federal professionals!) and rest on the assumption that individuals versed in each discipline must oversee investigations. These "discipline" concepts include the value of materials for current and future research in the field, the potential contribution of materials in broadening the knowledge base, and the need to replicate or verify previous research (see also Childs 1999). These values, the majority of which federal and non-federal professionals share, underlie this second principle of accountability - the appropriate treatment and long-term preservation of materials.

Prior to 1990, the year of the publication of both 36 CFR Part 79 and the Native American Graves Protection and Repatriation Act (NAGPRA), it is safe to say that most cultural resources (i.e., prehistory, history, and ethnography) specialists were not familiar with the ethical code or

practices of curation. Nor were most federal cultural resources specialists familiar with the concept of public accountability. As the 1987 GAO audit discussed below indicates, items collected during federally-funded research frequently were entrusted to apparently reputable institutions with limited paperwork and little attention to ownership.² The specific treatment these objects would receive was not usually addressed. Many, if not most, museums and institutions viewed federal material in their possession as their property to be accounted for in the same way as other material in their collections.

The deadlines imposed by NAGPRA for the identification of certain types of materials in collections, coupled with the clarification of collections as federal property and the minimum standards set by the uniform regulations at 36 CFR Part 79, jarred museum curators and federal cultural resources managers. As the number of symposia and discussions over the past eight and one-half years illustrates, both sides are coming to grips with what federal accountability means.

The Why of 36 CFR Part 79

The sequence of passage of major pieces of historic preservation and related legislation over the century clearly reflects growing concern over the accelerating loss of resources (see Table 1). The increase in the number and kinds of development projects and the expansion of federal assistance programs have resulted in more, and more visible, cultural resources management programs. These, in turn, have heightened general interest in cultural resources. The awareness of the value and loss of these resources has led to additional and more detailed legislation and the collection of more material.

With all these federal cultural resources mandates and rigorous property management

requirements in place, *Why was there a need for additional regulation of the relatively narrow subject of curation of archeological collections?* The 1980 amendments to the National Historic Preservation Act (NHPA) formally recognized that there was a general lack of understanding of the standards for curation, of consistency, and of accountability in the way agencies cared for material they had collected. Section 101(a)(7)(A) of the 1980 amendments to NHPA required the preparation of regulations applicable to all agencies to govern the curation of specific collected materials. The process began with circulation of a draft regulation in 1981 and ended with final publication of 36 CFR Part 79 in September of 1990. Between these two dates an event occurred which Michele Aubrey, the principal author of 36 CFR Part 79, identifies as the primary impetus to completing the regulations (personal communication 1996). The event was not in the historic preservation arena, but in property accountability.

The GAO, whose audits Congress uses as a tool to check on the accountability of agencies, was directed in December of 1985 to scrutinize the extent of looting on federal lands and the status of archeological collections in Arizona, Colorado, New Mexico, and Utah which were the responsibility of three federal agencies. In the conclusions to Chapter 5 of its report, the GAO states:

1. None of the agencies examined have a system of internal controls adequate to provide accountability;
2. Accountability has been poor, in part, because of lack of regulations to guide agencies;
3. Failure of some agencies to adopt regulations could result in different instructions and subsequent problems for curatorial facilities; and

4. Agencies' records of existing artifact collections are incomplete and agencies are doing few inspections called for in the draft regulation (1987:78).

One of the report's recommendations was that final, uniform regulations governing curation should be issued immediately to guide agencies.

With the publication of 36 CFR Part 79 almost three years later, there existed a set of minimum standards for the treatment of collections that applied to all agencies collecting or permitting the collection of resources under the referenced acts. The regulations did not set up deadlines for meeting the standards, did not address the need for uniformity of recording/cataloging systems, did not establish reporting or periodic inventory requirements, and did not provide for deaccessioning of materials. These important items were omitted because the drafters of the regulation understood the enormous effort and expense involved in coping with the backlog of work, in mandatory inventories, and in developing uniform systems for cataloguing (including software) and reporting. Thus, they opted not to include such requirements to move the regulations forward. Deaccessioning was a particularly thorny problem whose growing issues are addressed elsewhere (Childs 1997; Sonderman 1996).

How Uniform Is Compliance with the Uniform Regulations?

Some eight and one-half years after the publication of 36 CFR Part 79 and 50 years after the institution of modern property management requirements, *How accountable are agencies for their collections?* To get some sense of progress in accountability by agencies, we looked at two measures as indicators. First, we attempted to identify the number of federal bureaus and agencies which have policies in place for curation of archeological materials (and associated

materials). Then we compared reports on the locations and sizes of collections given by agencies and by repositories as a measure of how well agencies know where their collections are housed.

Measure 1 - Agencies with Curation Policies

Considering the GAO's 1987 comment that failure of agencies to incorporate the regulations into their own policies would result in problems, and with the understanding that rarely do agencies act without adopting their own policy at the national, and often at the local, level, this measure provides the most basic indication of movement toward compliance with curation requirements. The curation policies identified here are those designed to address all materials in collections; some agencies have developed policies to address NAGPRA concerns, but not other museum collections.

Data from Tompkins (1996), narrative data provided by Haas (1996, 1998) (see description under Measure 2), and data from contacts with agencies were combined to examine this issue. If we have overlooked any entity, we apologize, and would appreciate additional information. The results of our review are in Table 2, and are discussed below.

Measure 2 - Locations and Sizes of Collections

In the absence of reporting requirements under the curation regulation, we searched for information in other types of reports. The two broad sources we discovered are data provided by repositories (NPS 1994) and by federal agencies (Haas 1996, 1998). The NPS (1994) data are the results of the Department of the Interior's (Interior) 1994 *Survey of Federally-Associated Collections Housed in Non-Federal Institutions*, specifically designed to identify those

repositories holding federal collections. The Haas (1996, 1998) data are from the agency responses to questions about collections management gathered by NPS for The Secretary of the Interior's report to Congress on federal archeological activities. Curation was specifically addressed for the first time in 1991. The results of the survey are organized in two data sets, one with quantitative information and the other with descriptive information. The results of our examination of this measure are in Tables 3 and 4 and are discussed below.

Results

Measure 1 - Agencies with Curation Policies.

Of the 49 agencies/bureaus listed in Table 2, eleven have identified departmental and/or bureau wide policy statements or plans including policy, and two say they are developing policy. The requirements of the Department of Interior's policy for managing museum property, found in the Interior Departmental Manual at Part 411, apply to all ten Interior bureaus or offices. Three bureaus have developed individual policy. The remainder, the majority, do not have an established internal policy, the status is unknown, or indicate they rely on others to provide guidance. (State Historic Preservation Offices are frequently expected to assume this responsibility.) It is important to note that nineteen of the agencies whose names are listed in the NPS quantitative data base have no quantitative entries nor narrative descriptions. It is possible that informal or formal policies exist, but were not reported in our sources.

Many of those who do not report or appear not to have policy are not primarily land managing agencies/bureaus. The requirements of Section 110 of the National Historic Preservation Act would apply only to the lands and buildings in which the agency has offices,

research centers, etc. In many cases these are managed by the General Services Administration which is then responsible for cultural resources compliance. The "missing" policy for these agencies may, in fact, be a statement of position on collections resulting from their compliance with Section 106 of the Act--the material is not federal property. The Natural Resources Conservation Service and the Federal Energy Regulatory Commission, two agencies with different missions who fall in this broad group, have policy stating that this is the case.

Measure 2 - Locations and Sizes of Collections

Our examination of the data revealed substantial discrepancies between the information reported by agencies and that reported by repositories holding Federal collections. Tables 3 through 5 summarize these data from which we make four key observations. First, it seems likely that some of the counts reported by agencies reflect primarily in-house or federal repository holdings (this is the case with the Bureau of Land Management collection) and are not representative of all collections for which the agencies have responsibility. Larger collection sizes for 1996 and 1997, particularly in Interior and Defense agencies/bureaus, represent substantial efforts to become accountable and may also reflect more detailed reporting.

Second, the size of some agencies' collections decreases over time, without explanation. This appears to be contrary to what would be expected, especially in the absence of deaccessioning regulations. Third, collections attributed to federal departments in the 1994 survey are not consistent with values provided by their reporting units, e.g., bureaus. For example, more than two and a quarter million objects are reported by repositories for the Department of Transportation (DOT), but there is no entry for the DOT in any annual report data,

and only one of the three bureaus within DOT provides a collection size: 5 cubic feet.

And finally, reports by specific agencies of zero collections, no data, or not applicable, in the annual report data base frequently are contradicted by repository reports. The most extreme examples include the Federal Highway Administration with more than two million reported items, the National Science Foundation with one and a quarter million items, and the Department of Commerce with 80,000+ objects. These agencies fall largely within the non-land managing category discussed above, and it is quite possible that many of these materials were collected from private lands during Section 106 investigations and deposited in the repository by a contractor or agency staff. The agency assumes no responsibility, but the facility remembers who deposited the material, particularly if it has no records on physical location and no donation form or agreement with a land owner.

Attempting to compare collection size information reported by agencies with collection size information reported by repositories (Table 3) was somewhat like comparing kiwi fruit and *Zea mays* -- not very useful. For example, the data supplied by the agencies to the NPS (Haas 1996, 1998) are entirely in cubic feet and linear feet, whereas the data gathered from the repositories (NPS 1994) are primarily in object counts, which are supplemented by boxes, cubic feet, unknown units, and number of sites.

Table 5 compares collection size and the percentage of the collection catalogued for a sample of federal agencies/bureaus over a three-year period after the NPS 1994 survey. The variation in collection size and in the portion of that changed collection size catalogued is substantial. With the exceptions of the Bureau of Reclamation which had 110 percent of its collection catalogued in 1995! but only 58 percent, and the Bureau of Land Management whose

percentage catalogued decreased from 80 percent in 1995 to 36 percent in 1997, the portion of collections catalogued increased steadily over the period. Increases and decreases in the size of collections and associated changes in the portions catalogued likely reflect substantial efforts to locate and verify collections and meet higher cataloguing standards. Changes in size of collections may also reflect repackaging and rehousing of the materials. A more accurate gauge of collection size and progress in cataloguing for Interior agencies can be found in the annual museum property reports of the bureaus to the department.

Since comparing the size of collections at repositories reported from the two sources was not possible, we looked at the fit between locations of collections reported by the two sources. We reviewed the repositories reporting federal collections in the NPS (1994) survey (return of 25 percent of the 2,614 surveyed; many large repositories not responding) and selected a small number of those bureaus/agencies listed by the repositories that also had discussed repositories in the narrative portion of the bureau or agency annual reports submitted to NPS (Haas 1996, 1998). For each of seven selected agencies/bureaus, we identified:

1. the specific repositories identified in the narrative response (Haas 1996, 1998);
2. the total number of repositories reporting material for the agency/bureau (NPS 1994); and
3. the number of repositories named in the agency narrative that corresponded with the institutions reporting material for that agency.

The results of the location comparison are in Table 4. It is interesting to note that even after the publication of the 1994 list and a substantial increase in the number of repositories reported by agencies, the matches between the two data sets are still very few. It is also not clear whether the

locations and sizes of collections discovered during research for NAGPRA materials are included in the information provided by agencies, even for 1997.

Conclusions

At least five conclusions can be drawn from our evaluation of the available data:

1. Most agencies do not appear to have formal policies governing curation;
2. Many agencies do not have a grasp of where their collections are housed, do not report all locations, or do not view collections as their responsibility;
3. Units used in reporting collection size are not comparable among sources;
4. When reporting is done, it is often inaccurate or inconsistent; and
5. There is no real source of current information on government-wide accountability for collections.

These conclusions clearly do not suggest a high level of accountability across the federal sector.

Documentation

Even when the locations of collections are known, the question of record keeping for collections still remains. *Do documentation systems allow access for researchers and facilitate*

federal accountability in a manageable way for each repository? Could the GAO compile empirical data to report to Congress on accountability for collections eleven years after the publication of its recommendations?

Over the past decade many repositories and agencies/bureaus have acquired software to manage their collections. A brief look at a very small sample of agencies and repositories illustrates the lack of uniformity in curation documentation. Table 6 lists the variety of software in use by bureaus within Interior for managing museum property and software used by a few Great Plains repositories.³ Even this tiny sample hints at the magnitude of the problem of using multiple software systems of different complexity and intent. This lack of uniformity increases the difficulty in assessing accountability at the Federal level and creates hurdles for researchers doing comparative work with collections that are part of the public trust.

The answers to the questions posed above are clearly "no."

Recommendations

Based on our review and conclusions, it is apparent that federal agencies do not manage collections uniformly which exacerbates accountability problems. Taking the following basic actions would move federal agencies toward responsible management:

- C All agencies should develop internal policies which require curation at least to the standards in 36 CFR Part 79 and action plans to carry out the policies.
- C Agencies must complete the first step of accountability--knowing where

collections are located and what is in the collection. It also requires knowing which federal agency is responsible for the collection, a sometimes daunting task when responsibility for land management has moved from one agency to another.⁴

- C Agencies which have deposited collections from private lands in repositories should work with the repositories to segregate those collections and where appropriate, provide support to bring the collection to standards and/or identify land owners.
- C In the absence of specific government-wide reporting requirements, agencies/bureaus should use their responses to the curation questions for the federal archeology report to provide accurate information. Information for Interior bureaus could be reported directly to the National Park Service by the Department from bureaus' annual reports on museum property management.
- C In cooperation with the museum community and professionals in each affected discipline, federal agencies should work to establish agreed upon units for reporting collection information. These would allow tracking and provide a real measure of the magnitude and types of collections available. It would also facilitate migrating data across the many software packages now in use, providing better access to researchers.⁵

In addition to these suggestions to address the items identified in our conclusions, we offer two other thoughts. Achieving accountability for collections will require federal agencies to cooperate

in good faith among themselves and with repositories to identify and regularly inventory the material for which they are responsible. Establishing a national clearinghouse through which all agencies and bureaus can provide and obtain information would be a beginning.

In the financial arena there exists a federal requirement that provides a model for cooperation in reviewing repositories. The Single Audit Act of 1984, as amended in 1996, and implemented by the US Office of Management and Budget Circular A-133 (1997), provides for a single annual audit of state and local governmental bodies and institutions receiving federal assistance under more than one program and/or from more than one agency. Developing a parallel approach to the review and inventory of federal collections would benefit both agencies and repositories.

We believe that federal agencies/bureaus and repositories can develop and implement a functional clearinghouse and an efficient review and inventory processes. These processes would result in greater accountability and savings in staff time and funding for agencies and repositories.

Acknowledgments

We are indebted to Dan Haas for the information from the annual report databases and to David Graham and Christine Pfaff for critical review.

Notes

¹ This original version of this paper was written for the Plains Archaeology Conference in October of 1996. The information from the Federal Archeological Report databases have been updated and the discussion and conclusions revised to reflect this additional data and other information.

No comparable update of nation-wide information from repositories is available.

² The expenditure of federal funds, and not the status of the land from which objects were removed, was often, and in some cases, is still viewed as the trigger for federal ownership of the collections. Some difficulties resulting from this view are noted below. For a summary discussion of ownership of these objects based on an examination of non-NAGPRA court cases, see Noble 1997.

³ In 1996 the Office of Acquisition and Property Management of Interior began an initiative to solve the problem of multiple systems in all areas of property management, including those for managing museum property. Several bureaus have selected one software system for collections management since that time.

⁴ An Interior team is drafting policy which addresses "ownership" of Interior collections to provide consistency across all Interior bureaus and office.

⁵ At the 1998 at the Second Conference on Partnership Opportunities for Federally-Associated Collections in San Diego, a select group met to discuss curation issues. Perhaps those discussions will address this problem.

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Table 1. Key cultural resource legislation that has resulted in or affected federal collections.

Date	Legislative Act	Public Law/Authority
1906	American Antiquities Act	P.L. 59-209 16 USC 431, 432, 433
1935	The Historic Sites Act	P.L. 74-292 now part of 49 USC 303
1960	Reservoir Salvage Act	P.L. 86-532 16 USC 469
1966	National Historic Preservation Act (NHPA)	P.L. 89-665 16 USC 470
1974	Archeological and Historic Preservation Act	P.L. 93-291 16 USC 469
1978	American Indian Religious Freedom Act	P.L. 95-341 42 USC 1996
1979	Archaeological Resources Protection Act	P.L. 96-95 16 USC 470
1980	Amendments to NHPA	P.L. 96-515 16 USC 470
1990	Native American Graves Protection and Repatriation Act	P.L. 101-601 25 USC 3001
1992	Amendments to NHPA	P.L. 102-575 16 USC 470

Table 2. Summary of federal agencies and subunits with policy/plans for managing archeological collections.¹

Department/Subunits	Formal Policy/ Plan Present	Comments
Department of Agriculture	-	-
C Farm Service Administration	no	Collections donated to SHPO, Historical Society, Tribe or other
C Farmers Home Administration	no	relies on SHPO
C Forest Service	no	-
C Natural Resource Conservation Service (formerly Soil Conservation Service)	yes	General Manual 420, part 401.35, Ownership and Curation of Artifacts
C Rural Electrification Administration	-	-
C Rural Utility Service	?	-
Department of Commerce	-	-
C Coast Guard	yes	historic materials - Standard Operating Procedures
C Economic Development Administration	?	-
C National Oceanic and Atmospheric Administration	no	require permittee to meet 36 CFR Part 79, relies on SHPO
Department of Defense (DOD)	-	-
C Department of the Air Force	yes	letter of May 13, 1992 - general policy being developed [Air Force instructions 84-103]
C Department of the Army C U.S. Army Corps of Engineers (COE)	yes	DOD/Army - E-1130-2-422, guidelines established in 1992

Table 2 continued

Department/Subunits	Formal Policy/ Plan Present	Comments
C Department of the Navy C U.S. Marine Corps	yes	Acquisition (Instruction 5754.1) and Deaccessioning (Instruction 5742.2) In 1995 the Assistant Secretary of the Navy for Installations & Environment alerted the Deputy Under-Secretary of Defense (DUSD) for Environmental Security (ES) of problems; 1995 Navy partnered with DUSD (ES) to complete archeological collection assessment for all DOD for continental US. After assessment DOD will partner with private sector for regional museums.
Department of Energy	no	relies on SHPO; four units have CRM plans or MOA for curation.
C Federal Energy Regulatory Commission	yes	Office of Pipeline Regulation, Guidelines for Reporting on Cultural Resources Investigations, Part II. F. Curation
Department of Health and Human Services	-	-
Department of Housing and Urban Development	?	-
Department of the Interior	yes	411 DM "Managing Museum Property" applies to all since 1993
C Bureau of Indian Affairs	no	-
C Bureau of Mines	no	abolished in FY95
C Bureau of Land Management	no	Museum collections management plan revised in 1997
C Bureau of Reclamation	yes	additional guidance in 1997
C Fish and Wildlife Service	yes	Museums (Part 126 FW 1-3 325)
C Minerals Management Service	?	-
C National Park Service	yes	pre-1941
C Office of Surface Mining	no	permittee responsible; will assist

Table 2 continued

Department/Subunits	Formal Policy/ Plan Present	Comments
C Office of Territorial and International Affairs	?	-
C US Geological Survey	(no)	have minor statement on their Internet homepage
Department of Justice	-	-
C Bureau of Prisons	no	donates collections to state-approved curation facility through formal Deed of Gift
C Immigration and Naturalization Service (INS)	no	FY94 COE assessed repositories, FY95 relies on SHPO; FY96 & 97 contractors place in facilities within the are of the project; INS assures regulations are met.
Department of State	no	historic only
Department of Transportation	-	-
C Federal Aviation Administration	?	-
C Federal Railroad Administration	?	-
C Federal Transit Administration	?	-
C St. Lawrence Seaway Development Corporation	?	-
Department of Treasury	no	historic only
Environmental Protection Agency	no	-
General Service Administration	(no)	but, reviewing all repositories in FY95 [Fine art covered under A-I-A Procedures Manual]
Resolution Trust Cooperation	?	-
National Aeronautic and Space Administration	(no)	but, installations in stages of developing plans to satisfy part 79
Nuclear Regulatory Commission	?	-
Smithsonian Institution	yes	SD 600 "Collection Management Policy" established in 1980
Tennessee Valley Authority	(no)	FY91 inventoried all facilities; FY96 & 97 Standards being evaluated and will be phased in at university repositories.

Table 2 continued

Department/Subunits	Formal Policy/ Plan Present	Comments
US Postal Service	?	-
Veterans Administration	?	-

¹ - compiled from Haas (1996, 1998), Tompkins (1996), and personal conversations with agencies/bureaus.

no- not discussed, no national report (only discussed for some units), conflicting information in written documents or from personal discussion with bureau/agency representative.

? - conflicting information - name appears in Haas (1996) database, but not in Haas (1996) narrative discussion.

Table 3. Comparison of archeological collections sizes from data obtained from federal agencies¹ and repositories.²

Department/Agency	1991 ¹ cubic feet linear feet	1992 ¹ cubic feet linear feet	1993 ¹ cubic feet linear feet	1994 ¹ cubic feet linear feet	1994 ² cubic feet	1994 ² objects	1994 ² boxes	1994 ² sites	1994 ² unidentifie d unit	1995 ³ cubic feet linear feet	1996 ³ cubic feet linear feet	1997 ³ cubic feet linear feet
Department of Agriculture	NR	NR	NR	NR	-	8,577	-	30	-	NR	NR	NR
C Farm Service Administration	NR	NR	NR	NR	-	-	-	-	-	ND	ND	ND
C Farmers Home Administration	0 0	0 0	0 0	ND	-	739	-	18	-	ND	ND	ND
C Forest Service	ND	ND	26,829* 90	2,682 5,215	44	291,403	1	5,286	1,190	6,913 7,110	23,603 2929	14,291 36,839
C Natural Resource Conservation Service (formerly SCS)	NR	NR	ND	ND	-	125,616	-	2,348	-	ND	ND	ND
C Rural Electrification Administration	NA	NA	NA	NR	-	11,762	-	366	-	NR	NR	NR
C Rural Utility Service	reported as not applicable				-	-	-	-	-	reported as not applicable		
Department of Commerce	NR	NR	NA	ND	-	80,031	-	2	-	ND	NR	NR
C Coast Guard	ND	ND	6 1	NR	-	27	-	4	-	0 0	ND	ND
C Economic Development Administration	NR	NR	NA	ND	-	7,716	-	12	-	ND	NA	NA
C National Oceanic and Atmospheric Administration	0 0	0 0	0 0	0 0	-	-	-	-	-	0 ND	ND	ND
Department of Defense	NR	NR	NR	NR	-	3,500	-	36	-	NR	NR	NR
C Department of the Air Force	1289 81	1305 81	499 395	768 442	-	100,028	2	5	105	898 688	893 856	1,286 790
C Department of the Army	3,457 658	4,710 715	13,274 690	5,611 746	-	24,942	23	444	-	12,264 ND	2,624 ⁷ ND	15,000 2,500
C US Army Corps of Engineers	41,708 1,438	27,663 2,750	4,713 3,855	68,783 3,932	513.5	1,998,319	379	7220	-	72,215 4,300	141,012 8,163	133,034 6,094

Table 3 continued

Department/Agency	1991 ¹ cubic feet linear feet	1992 ¹ cubic feet linear feet	1993 ¹ cubic feet linear feet	1994 ¹ cubic feet linear feet	1994 ² cubic feet	1994 ² objects	1994 ² boxes	1994 ² sites	1994 ² unidentifie d unit	1995 ³ cubic feet linear feet	1996 ³ cubic feet linear feet	1997 ³ cubic feet linear feet
C Department of the Navy	752 ND	923 ND	ND	ND	3	101,670	-	19	-	7,222 753	9,951 1,037	4,513 236
C US Marine Corps	ND	ND	NR	ND	-	6,200	-	7	-	ND	ND	1,227 34.5
Department of Energy	2,590 550	2,780 617	4,282 712	3,705 393	-	7,877	-	1,043	-	7,591 766	5,063 847	4,070 483
C Federal Energy Regulatory Commission	NR	NR	NA	NA	-	3,000	-	17	-	NA	NA	NA
Department of Health and Human Services	1 .04	1 .04	0	NA	-	0	-	-	-	NA	ND	NA
Department of Housing and Urban Development	ND	NR	ND	NR	-	29,057	75	60	-	ND	ND	ND
- Urban Development Action Grant	NR	NR	NR	NR	-	24,150	-	-	-	NR	NR	NR
Department of the Interior	NR	NR	NR	NR	-	19,334	-	663	-	NR	NR	NR
C Bureau of Indian Affairs	4,812 2	4,812 2	4,812 2	48,009 20	656	100,894	1	279	1	48,009 20	ND	ND
C Bureau of Mines	NR	NR	0 0	0 0	-	700	25	285	-	NR	agency abolished	
C Bureau of Land Management	3,126,000 1,205	3,126,000 1,205	3,198,000 1,210	3,308,000 1,249	1449	1,615,002	316	20,177	4	ND 1,300	ND	13,405 1,647
C Bureau of Reclamation	11,816 261	11,040 253	14,885 302	12,958 323	1	212,934	52	1612	-	9,405 230	13,495 394	13,495 424
C Fish and Wildlife Service	230,000 23	210,500 23	4,500 327	5,980 420	122.01	76,346	-	264	-	17,000 450	ND 620	20,600 1,032
C Minerals Management Service	reported as not applicable				-	-	-	-	-	reported as not applicable		

Table 3 continued

Department/Agency	1991 ¹ cubic feet linear feet	1992 ¹ cubic feet linear feet	1993 ¹ cubic feet linear feet	1994 ¹ cubic feet linear feet	1994 ² cubic feet	1994 ² objects	1994 ² boxes	1994 ² sites	1994 ² unidentified unit	1995 ³ cubic feet linear feet	1996 ³ cubic feet linear feet	1997 ³ cubic feet linear feet
C National Park Service	18,057 439	ND	ND	-	251.5	1,324,776	637	1,277	10	ND* 3,427,997*	30,948,157 22,393	29,964,902 23,703
C Office of Surface Mining	NA	NA	ND	ND	-	987	-	95	-	NA	ND	ND
C Office of Territorial and International Affairs	NA	NA	NR	0 0	-	-	-	-	-	0 0	ND	NA
C US Geological Survey	NA	0	0	ND	-	-	-	-	-	0 0	0 0	NA
Department of Justice	NR	NR	NR	NR	-	-	-	-	-	0 0	NR	NR
C Bureau of Prisons	0 0	0 0	0 0	0 0	-	-	-	-	-	0 0	1 0	0 3
C Immigration and Naturalization Service	NR	NR	0 0	0 NA	-	-	-	-	-	0 NA	0 0	2 0.5
Department of Labor	NR	NR	NR	NR	-	4	-	-	-	NR	NR	NR
Department of State	no data reported by department				-	-	-	-	-	no data reported by department		
Department of Transportation (DOT)⁴	NR	NR	NR	NR	-	2,343,070	-	332	-	NR	NR	NR
C Federal Aviation Administration	NA	NA	ND	0 0	-	31,956	-	90	-	5 300	ND	0
C Federal Highway Administration	NR	NR	NR	NR	-	2,003,824	-	2,078	-	ND	ND	ND
C Federal Railroad Administration	0 0	0 0	ND	NR	-	-	-	-	-	0 0	ND	NA
C Federal Transit Administration	ND	ND	ND	NA	-	-	-	-	-	ND	ND	ND
C St. Lawrence Seaway Development Corporation	NR	NR	0 0	NR	-	-	-	-	-	NR	NR	NR

Table 3 continued

Department/Agency	1991 ¹ cubic feet linear feet	1992 ¹ cubic feet linear feet	1993 ¹ cubic feet linear feet	1994 ¹ cubic feet linear feet	1994 ² cubic feet	1994 ² objects	1994 ² boxes	1994 ² sites	1994 ² unidentifie d unit	1995 ³ cubic feet linear feet	1996 ³ cubic feet linear feet	1997 ³ cubic feet linear feet
C Urban Mass Transit Authority	NR	NR	NR	NR	-	26,058	-	2	-	NR	NR	NR
Department of Treasury	no data reported by department				-	-	-	-	-	no data reported by department		
Environmental Protection Agency	ND	ND	ND	ND	-	50,444	-	271	232	NA	10 4	1 NA
General Service Administration	30 5	31 6	1551 351	1,615 67	9	2,910,262	-	186	1	1,745 51	ND	1,500 30
Resolution Trust Corporation	no data reported by department				-	-	-	-	-	no data reported by department		
National Aeronautic and Space Administration	ND	ND	59 10	60 11	-	-	-	-	-	60 11	64 14	115 11
National Endowment for the Humanities	NR	NR	NR	NR	-	170,500	115	1	-	NR	NR	NR
National Science Foundation	NR	NR	NR	NR	32	1,206,113	-	34	-	NR	NR	NR
Nuclear Regulatory Commission	NR	NR	NA	NA	-	650	-	4	-	NA	NA	NA
Smithsonian Institution	NR	NR	0	NA	-	30,612	29	43	-	NA	NA	NA
Tennessee Valley Authority	3,405 123	3,415 124	3,422 126	3,428 129	-	3,422,089	-	449	-	3,435 131	3,545 133	3835 139
US Postal Service	0 0	0 0	ND	ND	-	33	-	1	-	NA	NA	0 0
Veterans Administration	NR	NR	ND	ND	-	-	-	-	-	ND	ND	ND

¹ data from Haas (1996)² data from NPS (1994)³ data from Haas (1998)⁴ DOT may cover its consistent bureaus

* probable error in reported value

NA: data requested was identified to be not applicable by department/agency

ND: no data provided by department/agency

NR: no data reported for department/agency by source

Table 4. Comparison of agency versus repository identification of collection locations.

Agency/Bureau	# of Repositories Named by Agency¹ (91-94)	# of Repositories Named by Agency² (95-97)	# of Repositories Reporting Collections For Agency/Bureau³	# of Matches (91-97)	Archeological Collections³	All Other Collections³
Air Force	5	6	26	1	100,028	8,405
Army	20	not reported	43	2	24,942	7,651
Bureau of Reclamation	3	20*	23	7	212,934	11,599
Natural Resources Conservation Service	0	not reported	11	0	11,762	3
Forest Service	15	30	79	9	291,403	23,921
Tennessee Valley Authority	7	7	8	4	3,422,089	16
NASA**	1	1	16	0	0	193

¹ data from Haas (1996) narrative

² data from Haas (1998) narrative

³ data from NPS (1994)

* "up to 50" reported by one region, unnamed

** No archeological materials reported by museums, but material reported by NASA

Table 5. Summary of collection size and percent catalogued for select archeological federal collection as reported by Haas 1998.

Department/Agency	1995 cubic feet %	1996 cubic feet %	1997 cubic feet %
Forest Service	6,913 50%	23,608 67%	14,291 70%
Department of the Air Force	898 80%	837 80%	1,286 90%
US Army Corps of Engineers	72,215 80%	141,012 81%	133,034 83%
Department of the Navy	7,222 52%	9,951 58%	4,513 80%
US Marine Corps	ND ND	ND ND	1,227 100%
Department of Energy	7,591 63%	5,063 99%	4,070 99%
Bureau of Indian Affairs	48,009 20%	ND ND	ND ND
Bureau of Land Management	ND 80%	ND ND	13,405 36%
Bureau of Reclamation	9,405 110%	13,495 NA	13,495 58%
Fish and Wildlife Service	17,000 90%	ND 80%	20,600 90%
National Park Service	3,427,997* 48%	30,948,157 51%	29,964,902 55%
Federal Aviation Administration	5 20%	ND ND	0 NA
Environmental Protection Agency	NA NA	10 100%	1 ND
General Service Administration	1,745 100%	ND ND	1,500 85%
National Aeronautic and Space Administration	60 100%	64 100%	115 100%

xprobable typographical error

ND = no data provided by department/agency

NA = data requested was identified to be not applicable by agency/bureau

Table 6. Summary of software used for museum property management of archeological collections by Department of the Interior and its bureaus and by a sample of repositories.

COLLECTION MANAGER	APPLICATION	LANGUAGE/SYSTEM
Department of the Interior		
Bureau of Indian Affairs	Federal Finance System, Fixed Asset Model; ReDiscovery (Washington Office)	Cobalt; FoxPro
Bureau of Land Management	Argus (Anasazi Heritage Center)	Unix/Windows
Bureau of Reclamation	SNAP, Multi-MIMSY; searching for new application	Q&A/DOS, Oracle/DOS
Fish and Wildlife Service	Custom Design; ReDiscovery (3 refuges)	Filemaker Pro/Macintosh; FoxPro
Indian Arts and Crafts Board	ReDiscovery	FoxPro
Interior Museum	ReDiscovery	FoxPro
Minerals Management Service	Property Management Info System (PMIS)	Access 2.0/Windows NT
National Park Service	Customized ReDiscovery	FoxPro
Office of Surface Mining	does not have museum property	does not have museum property
Office of Territorial and International Affairs	does not have museum property	does not have museum property
Office of the Secretary, Museum Property Program	ReDiscovery	FoxPro
US Geological Survey	Federal Finance System, Fixed Asset Model	Cobalt
REPOSITORY		
Montana State University*	Questor Systems: Argus	Unix in Universe
Museum of the Great Plains	Custom Design	Access/Windows
South Dakota Archeological Research Center	Custom Design	Access/Windows
University of Kansas - Museum of Anthropology	Custom Design	Filemaker Pro/Macintosh, Excel/Windows
University of North Dakota	Custom Design	Access/Windows
University of Wyoming	Custom Design	dBase
Wichita State University	Custom Design	dBase, Lotus, paper records

* Abandoning this software for something else